

ADDENDUM TO THE FACT SHEET
FOR 2005 REAUTHORIZATION OF
NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0040479

I. GENERAL INFORMATION

Facility: Town of South Prairie
P.O. Box F
South Prairie, WA 98385

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on November 29, 2004, and December 22, 2004, and accepted by the Department on January 4, 2005. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's production levels; Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in Washington Administrative Code (WAC) 173-216 and WAC 173-200.

The application for Town of South Prairie was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Town of South Prairie for the discharge of wastewater to South Prairie Creek. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1999. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a complete renewal of the permit.

Even though the permit is essentially the same as the previous permit issued on May 2, 2000, the Department felt that a few changes to the permit were necessary. The most significant change was transferring the old permit conditions into the new Department permit format which includes updates to standard permit language. Other changes made to the permit are outlined below:

- a. Influent temperature is not required to be reported and is not used for permit compliance therefore the Department has removed the requirement to report influent temperature.
- b. Even though effluent ammonia is only required to be reported in lbs/day from May to October, the Department added the requirement to report effluent ammonia in mg/L year round in order to collect enough information during the permit term to determine whether or not an ammonia limit will be required in the next permit.
- c. Measuring dissolved oxygen in the recirculation tank is related to process control and not permit compliance. Therefore, the requirement to report dissolved oxygen in the recirculation tank has been removed.
- d. Effluent settleable solids are not required to be reported and are not used for permit compliance. Therefore, the Department has removed the requirement to report settleable solids in the effluent
- e. The Department and the Permittee now have more experience with the maintenance needs for the STEP/STEF septic tanks and have determined that they do not need to be checked on an annual basis unless they have been determined to be a problem tank. Therefore, the requirement to check the sludge depth in the individual domestic STEP/STEF tanks has been changed from annually to a minimum of once every three years.
- f. Checking the sludge depth in the recirculation tank and holding tank is related to internal process control and not directly related to permit compliance. Therefore, the requirement to report sludge depth in the recirculation tank and holding tank has been removed from the permit.
- g. The Town of South Prairie has a STEP system. The STEP tanks provide some level of treatment prior to discharge to the sanitary collection system. Since there is no practical way to measure the amount of treatment in each tank it would be impossible to directly measure the percent removal efficiency across the treatment plant. As long as permit limits are met and there is no excessive infiltration and inflow 85 percent can be presumed. Therefore, the requirement to report percent removals for BOD₅ and TSS have been removed from the permit.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over with the above listed changes to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were left unchanged. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued WAC 173-220-050. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

RESPONSE TO COMMENTS

On February 16, 2005, the Department received comments from the Town of South Prairie.

Comment:

Condition S2 – Monitoring Requirements of the permit includes a requirement that the sludge depth in all RV/Commercial STEP/STEF septic tanks be measured quarterly. It has been our operator's experience over the last several years that quarterly measurement of sludge depth in commercial STEP/STEF tanks is more frequent than is necessary. We respectfully request that this condition of the permit be modified to require annual monitoring of the town's commercial STEP/STEF tanks, and semi-annual sludge measurements for the South Prairie RV Park STEP tanks.

Response:

The Department will change the frequency for measuring sludge depth in the Town's STEP/STEF tanks to an as needed basis.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on May 16, 2004, and May 23, 2004, in *the Tacoma News Tribune* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on February 1, 2005, in *the Tacoma News Tribune* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Carey Cholski
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6279, or by writing to the address listed above.